

**IN THE UNITED STATES BANKRUPTCY COURT**  
**FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE:	NO. 17-24417-CMB
Sharon M. Friedel	CHAPTER 13
Debtor	
Ronda J. Winnecur, Chapter 13 Trustee	Related to Document No. 42
Movant	
vs.	
PNC Bank, N.A.	
Respondent	

**STIPULATION AND ORDER AS TO TRUSTEE'S MOTION TO PRECLUDE**  
**POSTPETITION MORTGAGE FEES EXPENSES AND CHARGES**

AND NOW, come the undersigned parties, by and through their respective counsel, and enter into the following Stipulation:

WHEREAS, Respondent, PNC Bank, N.A., filed a Notice of Post-Petition Mortgage Fees, Expenses, and Charges (the "PPFN") on April 11, 2018 listing fees and expenses totaling \$825.00; and

WHEREAS, the Chapter 13 Trustee has filed a Motion to Preclude those fees and charges; and

WHEREAS, Respondent, solely to resolve this matter promptly and without an admission of liability or any concession of any statement of law or fact contained in the Trustee's Motion, has determined to waive the fees and charges contained in the PPFN, and did in fact waive the charges, as shown on the loan history attached hereto as Exhibit A.

It is therefore Stipulated and agreed as follows:

1. Respondent's requested fees and charges in the amount of \$825.00 are waived and adjusted in the Debtor's favor, as shown in the affidavit and loan history attached hereto as Exhibit A.
2. The Chapter 13 Trustee's Motion to Preclude is denied as moot.
3. Respondent is prohibited from adding any fees or other charges to the Debtor's account in connection with the response to or resolution of the Chapter 13 Trustee's Motion to Preclude, or for otherwise complying with this Stipulation and Order.
4. The hearing in this matter scheduled for June 5, 2019 at 11:00 a.m. is cancelled, and no further responsive pleadings in this matter shall be required.

Consented to by:

/s/ Ronda J. Winnecour  
Ronda J. Winnecour, Esquire  
Chapter 13 Trustee  
US Steel Tower-Suite 3250  
Pittsburgh, PA 15219  
Phone: 412-471-5566  
[rwinnecour@chapter13trusteewdpa.com](mailto:rwinnecour@chapter13trusteewdpa.com)

/s/ James C. Warmbrodt, Esquire  
James C. Warmbrodt, Esquire  
Attorney for Respondent  
KML Law Group, P.C.  
701 Market Street, Suite 5000  
Philadelphia, PA 19106  
Phone: 215-627-1322  
[jwarmbrodt@kmllawgroup.com](mailto:jwarmbrodt@kmllawgroup.com)

It is hereby ORDERED that the parties' Stipulation be and hereby is APPROVED.

By the Court,



FILED  
4/15/19 2:50 pm  
CLERK  
U.S. BANKRUPTCY  
COURT - WDPA

**Certificate of Notice Page 3 of 3**  
**United States Bankruptcy Court**  
**Western District of Pennsylvania**

In re:  
 Sharon M Friedel  
 Debtor

Case No. 17-24417-CMB  
 Chapter 13

**CERTIFICATE OF NOTICE**

District/off: 0315-2

User: gamr  
 Form ID: pdf900

Page 1 of 1  
 Total Noticed: 1

Date Rcvd: Apr 15, 2019

Notice by first class mail was sent to the following persons/entities by the Bankruptcy Noticing Center on Apr 17, 2019.

db +Sharon M Friedel, 2227 White St, Pittsburgh, PA 15226-1614

Notice by electronic transmission was sent to the following persons/entities by the Bankruptcy Noticing Center.  
 NONE. TOTAL: 0

\*\*\*\*\* BYPASSED RECIPIENTS \*\*\*\*\*

NONE. TOTAL: 0

Addresses marked '+' were corrected by inserting the ZIP or replacing an incorrect ZIP.  
 USPS regulations require that automation-compatible mail display the correct ZIP.

Transmission times for electronic delivery are Eastern Time zone.

**I, Joseph Speetjens, declare under the penalty of perjury that I have sent the attached document to the above listed entities in the manner shown, and prepared the Certificate of Notice and that it is true and correct to the best of my information and belief.**

**Meeting of Creditor Notices only (Official Form 309): Pursuant to Fed. R. Bank. P. 2002(a)(1), a notice containing the complete Social Security Number (SSN) of the debtor(s) was furnished to all parties listed. This official court copy contains the redacted SSN as required by the bankruptcy rules and the Judiciary's privacy policies.**

Date: Apr 17, 2019

Signature: /s/Joseph Speetjens

**CM/ECF NOTICE OF ELECTRONIC FILING**

The following persons/entities were sent notice through the court's CM/ECF electronic mail (Email) system on April 15, 2019 at the address(es) listed below:

David Neeren on behalf of Creditor PNC Bank, National Association dneeren@rasnj.com  
 James Warmbrodt on behalf of Creditor PNC Bank, National Association bkgroup@kmllawgroup.com  
 Jeffrey R. Hunt on behalf of Creditor Pittsburgh Water & Sewer Authority jhunt@grblaw.com,  
 cnoroski@grblaw.com  
 Jeffrey R. Hunt on behalf of Creditor City & School District of Pittsburgh jhunt@grblaw.com,  
 cnoroski@grblaw.com  
 Lawrence W. Willis on behalf of Debtor Sharon M Friedel ecf@westernpabankruptcy.com,  
 urfreshstrt@gmail.com  
 Office of the United States Trustee ustpregion03.pi.ecf@usdoj.gov  
 Ronda J. Winnecour cmevf@chapter13trusteevdpa.com

TOTAL: 7